

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

ST. JOSEPH HEALTH SERVICES OF
RHODE ISLAND, INC.

v.

ST. JOSEPH'S HEALTH SERVICES OF
RHODE ISLAND RETIREMENT PLAN,
AS AMENDED

In re:

CHARTERCARE COMMUNITY BOARD,
ST. JOSEPH HEALTH SERVICES OF
RHODE ISLAND and ROGER
WILLIAMS HOSPITAL

C.A. No.: PC-2017-3856

C.A. No.: PC-2019-11756

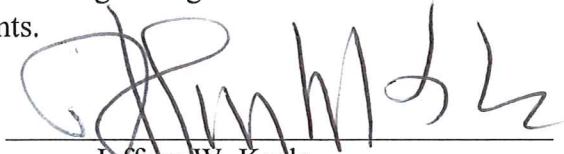
AFFIDAVIT OF JEFFREY W. KASLE

Jeffrey W. Kasle, being duly sworn, hereby deposes and says:

1. I am submitting this affidavit in connection with the Petition to Partially Distribute Corpora of Certain Trusts, which is presently scheduled for hearing on February 15, 2023.
2. I am a member in good standing on the Bar of Rhode Island since 1981.
3. On October 10, 2018, I informed this Court that the 247 participants in the St. Joseph Health Services of Rhode Island Retirement Plan that I represent (in connection with meetings with the Receiver), fully supported Settlement A (involving claims against CharterCARE Community Board, Roger Williams Hospital and St. Joseph Health Services of Rhode Island).
4. I also fully supported Settlement B (involving claims against CharterCARE Foundation).
5. I also fully supported the third settlement, between and among Stephen Del Sesto (as Receiver and Administrator of the St. Joseph Health Services of Rhode Island Retirement Plan), and Gail J. Major, Nancy Zompa, Ralph Bryden, Dorothy Willner, Caroll Short, Donna Boutelle, and Eugenia Levesque, and Thomas Hemmendinger (then the Liquidating Receiver for CharterCARE Community Board), Prospect Medical Holdings, Inc., Prospect East Holdings, Inc., Prospect Chartercare, LLC, Prospect Chartercare SJHSRI, LLC, Prospect Chartercare RWMC, LLC, The Angell Pension Group, Inc., Sam Lee, and David Topper.


6. I also fully supported the Petition to Apply Trust Income to Pension Plan which was granted on April 7, 2022 in the Liquidating Receivership, which represented a significant recovery for the Plan, of the accumulated and future income and distributions from certain trusts that had been previously payable to St. Joseph Health Services of Rhode Island or Roger Williams Hospital.

7. On behalf of the nearly 250 participants in the St. Joseph Health Services of Rhode Island Retirement Plan whom I represent, I fully support granting the pending Petition to Partially Distribute Corpora of Certain Trusts. I believe that granting that Petition will be far more beneficial to that Retirement Plan than periodic payments.



Jeffrey W. Kastle

SUBSCRIBED AND SWORN to before me this 13th day of February, 2023.



NOTARY PUBLIC *Krista Schmitz*
My Commission Expires: 9-17-23

Krista J. Schmitz
Notary Public, State of Rhode Island
My Commission Expires 9 /17 /23

CERTIFICATE OF SERVICE

I hereby certify that, on the 14th day of February, 2023, I filed and served the foregoing document through the electronic filing system on the following users of record:

Stephen F. Del Sesto, Esq.
Pierce Atwood LLP
One Financial Plaza, 26th Floor
Providence, RI 02903
sdelsesto@pierceatwood.com

Maria R. Lenz, Esq.
Julie Harvey, Esq.
Sarah Rice, Esq.
Office of the Attorney General
150 South Main Street
Providence, RI 02903
mlenz@riag.ri.gov
jharvey@riag.ri.gov
SRice@riag.ri.gov

Richard J. Land, Esq.
Chace Ruttenberg & Freedman, LLP
One Park Row, Suite 300
Providence, RI 02903
rland@crfillp.com

Christopher Callaci, Esq.
United Nurses & Allied Professionals
375 Branch Avenue
Providence, RI 02903
ccallaci@unap.org

Arlene Violet, Esq.
499 County Road
Barrington, RI 02806
genvio@aol.com

W. Mark Russo, Esq.
Ferrucci Russo, P.C.
55 Pine Street, 4th Floor
Providence, RI 02903
mrusso@frlawri.com

Elizabeth Wiens, Esq.
Gursky Wiens Attorneys at Law
1130 Ten Rod Road, Suite C207
North Kingstown, RI 02852
ewiens@rilaborlaw.com

Jeffrey W. Kastle, Esq.
Olenn & Penza
530 Greenwich Avenue
Warwick, RI 02886
jwk@olenn-penza.com

George E. Lieberman, Esq.
Gianfrancesco & Friedmann
214 Broadway
Providence, RI 02903
george@gianfrancescolaw.com

Howard Merten, Esq.
Partridge Snow & Hahn LLP
40 Westminster Street, Suite 1100
Providence, RI 02903
hm@psh.com

Stephen Morris, Esq.
Rhode Island Department of Health
3 Capitol Hill
Providence, RI 02908
stephen.morris@ohhs.ri.gov

William M. Dolan, III, Esq.
Adler Pollock & Sheehan P.C.
One Citizens Plaza, 8th Floor
Providence, RI 02903-1345
wdolan@apslaw.com

Ekwan Rhow, Esq.
Bird, Marella, Boxer, Wolpert, Nessim,
Drooks, Licenberg & Rhow, P.C.
1875 Century Park East, 23rd Floor
Los Angeles, CA 90067-2561
erhow@birdmarella.com

Preston Halperin, Esq.
Christopher J. Fragomeni, Esq.
Dean J. Wagner, Esq.
Savage Law Partners
564 South Water Street
Providence, RI 02903
phalperin@shslawfirm.com
chris@savagelawpartners.com
dwagner@savagelawpartners.com

Thomas S. Hemmendinger, Esq.
Sean J. Clough, Esq.
Lisa M. Kresge, Esq.
Ronald F. Cascione, Esq.
Brennan Recupero Cascione Scungio
McAllister LLP
362 Broadway
Providence, RI 02909
themmendinger@brcsm.com
sclough@brcsm.com
lkresge@brcsm.com
rcascione@brcsm.com

Steven J. Boyajian, Esq.
Daniel R. Sullivan, Esq.
Robinson & Cole LLP
One Financial Plaza, Suite 1430
Providence, RI 02903
Sboyajian@rc.com
dsullivan@rc.com

Ryan M. Gainor, Esq.
Hinckley, Allen & Snyder LLP
100 Westminster Street, Suite 1500
Providence, RI 02903
rgainor@hinckleyallen.com

The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Benjamin Ledsham